

1 Joseph J. Tabacco, Jr. (75484)  
2 Email: jtabacco@bermanesq.com  
3 Christopher T. Heffelfinger (118058)  
Email: cheffelfinger@bermanesq.com  
4 Nicole Lavallee (165755)  
Email: nlavallee@bermanesq.com  
James Magid (233043)  
Email: jmagid@bermanesq.com

**BERMAN, DeVALERIO, PEASE, TABACCO  
BURT & PUCILLO**

425 California Street, 21st Floor  
San Francisco, California 94104  
Telephone: (415) 433-3200  
Facsimile: (415) 433-6382

**Proposed Liaison Counsel for Proposed Lead Plaintiffs**

[Additional Counsel Appear on Signature Page]

**\*E-FILED - 2/2/07\***

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

13 HARRIET GOLDSTEIN, Individually and on ) Case No. C-06-06286 RMW  
14 Behalf of All Others Similarly Situated, ) CLASS ACTION  
15 Plaintiff, )  
16 vs. )  
17 SEHAT SUTARDJA, WEILI DAI, PANTAS )  
SUTARDJA, GEORGE A. HERVEY, and )  
MARVELL TECHNOLOGY GROUP, LTD., )  
18 Defendants. )  
19 )  
20 )  
21 CARTER BRANTNER, Individually and on ) Case No. C-06-06441 SI  
22 Behalf of All Others Similarly Situated, )  
23 Plaintiff, )  
24 vs. )  
25 MARVELL TECHNOLOGY GROUP, LTD., )  
SEHAT SUTARDJA and GEORGE A. )  
HERVEY, )  
26 Defendants. )  
27 [Captions Continued on Next Page] )  
28 )

**STIPULATION AND [] ORDER  
CONSOLIDATING RELATED ACTIONS,  
APPOINTING LEAD PLAINTIFFS AND  
APPROVING SELECTION OF LEAD  
COUNSEL**

DATE: January 26, 2007  
TIME: 9:00 a.m.  
CTRM: 6

CARTER BRANTNER, Individually and on ) Case No. C-06-06441 SI  
Behalf of All Others Similarly Situated, )  
Plaintiff, )  
vs. )  
MARVELL TECHNOLOGY GROUP, LTD., )  
SEHAT SUTARDJA and GEORGE A. )  
HERVEY, )  
Defendants. )

[C-06-06286 RMW] STIPULATION AND [] ORDER CONSOLIDATING  
RELATED ACTIONS, APPOINTING LEAD PLAINTIFFS AND APPROVING SELECTION  
OF LEAD COUNSEL

1                   TIMOTHY MAHRT, Individually and on )      Case No. C-06-06731 SBA  
 2                   Behalf of All Others Similarly Situated, )  
 3    )  
 4    Plaintiff, )  
 5    )  
 6    vs. )  
 7    )  
 8    SEHAT SUTARDJA, WEILI DAI, PANTAS )  
 9    SUTARAJA, GEORGE A. HERVEY and )  
 10   MARVELL TECHNOLOGY GROUP, LTD., )  
 11    )  
 12    Defendants. )  
 13    )  
 14    )

---

15                   SHAWN M. PERRY, Individually and on )      Case No. C-06-07039 JSW  
 16                   Behalf of All Others Similarly Situated, )  
 17    )  
 18    Plaintiff, )  
 19    )  
 20    vs. )  
 21    )  
 22    MARVELL TECHNOLOGY GROUP, LTD., )  
 23    SEHAT SUTARDJA, WEILI DAI, PANTAS )  
 24    SUTARDJA and GEORGE A. HERVEY, )  
 25    )  
 26    Defendants. )  
 27    )  
 28    )

---

15  
 16       WHEREAS, seven separate Lead Plaintiff motions were filed in connection with these  
 17 actions. Five have been withdrawn, which leaves only two Lead Plaintiff motions, which were  
 18 filed by: (1) the Police and Fire Retirement System of the City of Detroit (“PFRS”); and (2) Monte  
 19 Paschi Asset Management S.G.R. S.p.A., Puerto Rico Government Employees Retirement  
 20 System, Laborers District Council Construction Industry Pension Fund, Bucks County Retirement  
 21 Board, and Southeastern Pennsylvania Transportation Authority (collectively referred to in the  
 22 papers as the “Marvell Institutional Investor Group”).

23       WHEREAS, PFRS and the Marvell Institutional Investor Group have now jointly moved  
 24 the Court for an Order consolidating actions, appointing both PFRS and two members of the  
 25 Marvell Institutional Investor Group, Monte Paschi Asset Management S.G.R. S.p.A. (“Monte  
 26 Paschi”) and Puerto Rico Government Employees Retirement System (“PRGERS”), as Lead  
 27 Plaintiffs and approving Kohn, Swift & Graf, P.C. and Schiffriin, Barroway, Topaz & Kessler LLP

28 [C-06-06286 RMW] STIPULATION AND [] ORDER CONSOLIDATING  
 RELATED ACTIONS, APPOINTING LEAD PLAINTIFFS AND APPROVING SELECTION  
 OF LEAD COUNSEL

1 as Co-Lead Counsel, and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel.

2 Therefore, IT IS HEREBY STIPULATED AND AGREED by the remaining Lead Plaintiff  
 3 movants, through their respective counsel of record, as follows:

4 **I. CONSOLIDATION**

5 1. Pursuant to Federal Rule of Civil Procedure 42 and § 78u-4(a)(3)(B)(ii) of the  
 6 Exchange Act, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”),  
 7 the following actions are hereby consolidated for all purposes into one action:

<b>Name &amp; Case No.</b>	<b>Date Complaint Filed</b>	<b>Judge Assigned</b>
Goldstein v. Sehat Sutardja, et al., 3:06-cv-06286-RMW	October 5, 2006	Honorable Ronald M. Whyte
Brantner v. Marvell Technology Group, Ltd., et al., 3:06-cv-06441-SI	October 16, 2006	Honorable Susan Illston
Mahrt v. Sehat Sutardja, et al., 4:06-cv-06731-SBI	October 30, 2006	Honorable Saundra B. Armstrong
Perry v. Marvell Technology Group Ltd., et al., 3:06-cv-07039-JSW	November 13, 2006	Honorable Jeffrey S. White

18 2. These actions shall be referred to as the “Consolidated Action.” This Stipulation  
 19 and Order shall apply to the Consolidated Action and to each case that is subsequently filed in this  
 20 Court or transferred to this Court that relates to the same subject matter as in the Consolidated  
 21 Action.

1                   3. Every pleading in this Consolidated Action shall bear the following caption:

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

## In re Marvell Technology Group, Ltd. Securities Litigation

Master File No. 06-06286 RMW

**THIS DOCUMENT RELATES TO:**

## CLASS ACTION

## [TITLE OF DOCUMENT]

4. When the document being filed pertains to all actions, the phrase "All Actions" shall appear immediately after the phrase "This Document Relates To:". When a document applies to some, but not all, of the actions, the document shall list, immediately after the phrase "This Document Relates To:", the docket number for each individual action to which the document applies, along with the name of the first-listed plaintiff in said action.

5. This Court requests the assistance of counsel in calling to the attention of the Clerk of this Court the filing or transfer of any case which might properly be consolidated as part of this Consolidated Action.

## **II. MASTER DOCKET AND MASTER FILE**

6. A Master Docket and Master File shall be established for the Consolidated Action. The Master File shall be No. C-06-06286 RMW. All orders, pleadings, motions and other documents shall, when filed and docketed in the Master File, be deemed filed and docketed in each individual case to the extent applicable. When an order, pleading, motion or document is filed with a caption indicating that it is applicable to fewer than all of these consolidated action, the Clerk shall file such pleadings in the Master File and note such filing in the Master Docket and in the docket of each action referenced.

[C-06-06286 RMW] STIPULATION AND [ ] ORDER CONSOLIDATING  
RELATED ACTIONS, APPOINTING LEAD PLAINTIFFS AND APPROVING SELECTION  
OF LEAD COUNSEL

1           **III. NEWLY-FILED OR TRANSFERRED ACTIONS**

2           7. When a case that arises out of the subject matter of this action is hereinafter filed in  
3 this Court or transferred to this Court from another court, the Clerk of this Court shall:

- 4                 a. file a copy of this Order in the separate file for such action;  
5                 b. mail a copy of this Order to the attorneys for the plaintiff(s) in the newly  
6 filed or transferred case and to any new defendant(s) in the newly filed or transferred case; and  
7                 c. make the appropriate entry in the docket for this action.

8           8. Each new case which arises out of the subject matter of this Consolidated Action  
9 that is filed in this Court or transferred to this Court shall be consolidated with this action and this  
10 Order shall apply thereto, unless a party objecting to this Order or any provision of this Order  
11 shall, within ten (10) days after the date upon which a copy of this Order is served on counsel for  
12 such party, files an application for relief from this Order or any provision herein and this Court  
13 deems it appropriate to grant such application.

14           **IV. APPOINTMENT OF LEAD PLAINTIFFS AND LEAD AND LIAISON COUNSEL**

15           9. Proposed lead plaintiffs PFRS, Monte Paschi and PRGERS have the largest  
16 financial interest in the relief sought by the class and, together, satisfy the requirements of Rule 23  
17 of the Federal Rules of Civil Procedure. Accordingly, pursuant to § 21D(a)(3)(B)(iii) of the  
18 PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(iii), PFRS, Monte Paschi and PRGERS shall be appointed as  
19 Lead Plaintiffs.

20           10. Lead Plaintiffs have selected Kohn, Swift & Graf P.C. and Schiffriin, Barroway,  
21 Topaz & Kessler, LLP as proposed Co-Lead Counsel and Berman DeValerio Pease Tabacco Burt  
22 & Pucillo as proposed Liaison Counsel. These law firms have the requisite experience and  
23 expertise to lead this litigation on behalf of the putative class. Accordingly, pursuant to §  
24 21D(a)(3)(B)(v) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(v), Kohn, Swift & Graf P.C. and  
25 Schiffriin, Barroway, Topaz & Kessler, LLP are approved as Co-Lead Counsel and Berman  
26 DeValerio Pease Tabacco Burt & Pucillo is approved as Liaison Counsel.

27           11. Co-Lead Counsel shall have the following responsibilities and duties, which are to  
28

1 be carried out either personally or through counsel whom Co-Lead Counsel shall designate:

- 2           a. to coordinate the briefing and argument of any and all motions;
- 3           b. to coordinate the conduct of any and all discovery proceedings;
- 4           c. to coordinate the examination of any and all witnesses in depositions;
- 5           d. to coordinate the selection of counsel to act as spokesperson at all pretrial  
conferences;
- 6           e. to call meetings of the plaintiffs' counsel as they deem necessary and  
appropriate from time to time;
- 7           f. to coordinate all settlement negotiations with counsel for defendants;
- 8           g. to coordinate and direct the pretrial discovery proceedings and the  
preparation for trial and the trial of this matter and to delegate work responsibilities to selected  
counsel as may be required;
- 9           h. to coordinate the preparation and filings of all pleadings; and
- 10          i. to supervise all other matters concerning the prosecution or resolution of the  
11         Consolidated Action.

12. Additionally, Co-Lead Counsel, assisted by Liaison Counsel, shall facilitate  
communications with the Court on behalf of plaintiffs' counsel and assist in coordination of  
plaintiffs' counsel's prosecution of the case.

13. No motion, discovery request or other pretrial proceedings shall be initiated or filed  
by any plaintiffs without the approval of Co-Lead Counsel, so as to prevent duplicative pleadings  
or discovery by plaintiffs. No settlement negotiations shall be conducted without the approval of  
Co-Lead Counsel.

14. Co-Lead Counsel, assisted by Liaison Counsel, shall have the responsibility of  
receiving and disseminating Court orders and notices.

15. Co-Lead Counsel shall be the contact between plaintiffs' counsel and defendants'  
counsel, as well as the spokespersons for all plaintiffs' counsel, and shall direct and coordinate the  
activities of plaintiffs' counsel.

1       16. Each attorney not a member of the Bar of this Court who is acting as counsel for a  
2 plaintiff herein shall be deemed admitted *pro hac vice* to practice before this Court in connection  
3 with these proceedings.

4 Dated: January 25, 2007

**BERMAN DeVALERIO PEASE TABACCO  
BURT & PUCILLO**

5  
6 By: /s/ Nicole Lavallee  
7 NICOLE LAVALLEE

8 Joseph J. Tabacco, Jr.  
9 Christopher T. Heffelfinger  
James Magid  
10 425 California Street, Suite 2100  
San Francisco, CA 94104  
Telephone: (415) 433-3200

11  
12 **Proposed Liaison Counsel for Proposed Lead Plaintiffs**

13 I, Nicole Lavallee, am the ECF User whose ID and password are being used to file this  
14 Stipulation and [Proposed] Order . In compliance with General Order 45, X.B., I hereby attest that  
Denis F. Sheils, Stuart L. Berman, and Bradley E. Beckworth have concurred in this filing.

15 Dated: January 25, 2007

KOHN, SWIFT & GRAF, P.C.

16  
17 By: /s/ Denis F. Sheils  
DENIS F. SHEILS

18 Joseph C. Kohn  
19 William E. Hoese  
One South Broad Street, Suite 2100  
20 Philadelphia, PA 19107  
Telephone: (215) 238-1700

21  
22 **Proposed Co-Lead Counsel**

1 Dated: January 25, 2007

2  
3  
4  
**SCHIFFRIN, BARROWAY, TOPAZ**  
**& KESSLER, LLP**

5  
6  
7 By: /s/ Stuart L. Berman  
8 STUART L. BERMAN

9 Sean M. Handler  
10 Nicolette Tropiano  
11 280 King of Prussia Road  
12 Radnor, PA 19087  
13 Telephone: (610) 667-7706

14  
15 **Proposed Co-Lead Counsel**

16 Dated: January 25, 2007

17  
18 **NIX PATTERSON & ROACH, LLP**

19 By: /s/ Bradley E. Beckworth  
20 BRADLEY E. BECKWORTH

21 Jeffrey J. Angelovich  
22 205 Linda Drive  
23 Daingerfield, TX 75638  
24 Telephone: (903) 645-7333

25  
26 **Additional Counsel for Proposed Lead Plaintiffs**

27 \* \* \* \*

28 **[] ORDER**

19  
20 **IT IS SO ORDERED.**

21 Dated: 2/2, 2007

22  
23  
24  
25  
26  
27  
28   
The Honorable Ronald M. Whyte  
United States District Judge